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**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NEW YORK**

In re: ROCHESTER DRUG CO-OPERATIVE, INC. Debtor.	Chapter 11 Case No. 20-20230 (PRW)
Advisory Trust Group, LLC, as trustee of the RDC LIQUIDATING TRUST. Plaintiff, v. BEIERSDORF, INC. Defendant.	Adv. Proc. No. 22-02009-PRW

SECOND STIPULATION EXTENDING TIME TO ANSWER COMPLAINT

Plaintiff, RDC Liquidating Trust, through its trustee Advisory Trust Group, LLC (“Plaintiff” or the “RDC Liquidating Trust”), successor in interest to Rochester Drug Co-Operative, Inc. (“Debtor”), and defendant, Beiersdorf, Inc. (“Defendant” and, together with Plaintiff, the “Parties”), by and through their undersigned attorneys, hereby stipulate and agree:

WHEREAS, on February 3, 2022, Plaintiff filed a complaint (the “Complaint”) against Defendant;

WHEREAS, the summons (the "Summons") was issued on February 4, 2022;

WHEREAS, on February 4, 2022, Defendant was served with the Summons and Complaint;
and

WHEREAS, on March 3, 2022, the Parties entered into a stipulation (the "First Stipulation")
by which the time required for Defendant to answer the Complaint was extended through and
including April 15, 2022. The First Stipulation was approved by order entered March 4, 2022.

The Parties hereby stipulate and agree to the matters set forth below:

1. The Parties continue to negotiate and exchange information and have agreed, subject
to Court approval, to further extend the time for the Defendant to answer the Complaint to and
including June 15, 2022.

2. All other terms set forth in the First Stipulation remain in full force and effect.

Dated: April 11, 2022

Dated: April 11, 2022

PACHULSKI STANG ZIEHL & JONES LLP

ALSTON & BIRD LLP

/s/ Ilan D. Scharf

Andrew T. Frisoli

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Counsel to Defendant Beiersdorf, Inc.

Counsel to Plaintiff RDC Liquidating Trust

SO ORDERED:

DATED: _____, 2022

Rochester, New York

HON. PAUL R. WARREN

United States Bankruptcy Judge